

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TIMOTHY O'NEIL,

Plaintiff,

v.

SHERIFF VICTOR HILL,

Defendant.

CIVIL ACTION FILE

NO.: 1:21-CV-04173-AT-CCB

DECLARATION OF JASON MARTIN
UNDER PENALTY OF PERJURY

1.

My name is Jason Martin. I am over the age of eighteen (18) years and am suffering under no legal disability that would prevent me from providing this declaration made pursuant to 28 U.S.C. § 1746. I make this declaration having personal knowledge of the facts stated herein, and with the understanding that it will be used in the above-styled action.

2.

I currently hold the title of Major at the Clayton County Sheriff's Office.

3.

I serve as the Jail Commander at the Clayton County Jail (“CCJ”). In such capacity I am well versed in all things related to the Grievance Procedure.

4.

In my capacity as Jail Commander, I also have access to all inmate files.

5.

The CCJ has formal procedures in place for confined persons to file grievances when they feel it is necessary to do so. A true and correct copy of the relevant portions of Clayton County Sheriff’s Office Standard Operating Procedures was previously submitted concurrently with defendant’s motion to dismiss. (Docs. 4-6.) These Procedures apply to both pretrial detainees and inmates at the CCJ.

6.

Detainees and inmates at the CCJ are informed and educated about the Grievance SOP during orientation. Moreover, CCJ staff are always available to answer questions regarding the Grievance SOP.

7.

Detainees and inmates are informed during orientation that, in lieu of paper Grievance Forms and Collection as described under subparagraphs 1 and 2 of the

Grievance SOP, they are required to use the Kiosk system to electronically submit grievances.

8.

These kiosks are located in every housing unit throughout the CCJ.

9.

When an inmate approaches a kiosk, they are prompted to enter their login credentials which requires his/her inmate identification number and a security pin.

10.

Following a successful login, the inmate is redirected to a main menu, which provides simple selections for their needs and requests. Those selections include medical requests, the general request system, the grievance system, and a copy of the inmate handbook.

11.

Upon selecting an option, an inmate must simply fill out the designated fields.

12.

For example, if an inmate elects the "Request System" tab from the home page, they will be re-directed to a request form, which they must simply fill out and then electronically submit.

13.

This simple, user-friendly, and minimal-step process is made accessible to all inmates within the CCJ.

14.

The process for submitting a medical or inmate request is the same as that which inmates use to file a grievance, and all these submissions occur on the same kiosks.

15.

Attached hereto are the following exhibits which I hereby authenticate as accurately representing the following:

- Exhibit 1: Screenshot images of the kiosks located throughout the CCJ. These images depict the login page, the homepage whereon inmates can select from a variety of options, the request system page, and the page whereon inmates submit electronic requests and/or grievances; and
- Exhibit 2: Copies of all requests submitted on the kiosk by plaintiff O'Neil (inmate ID number 2100478) throughout his time detained at the CCJ.

16.

By my signature below, I declare, under penalty of perjury, that the foregoing is true and correct.

[Signature intentionally on next page]

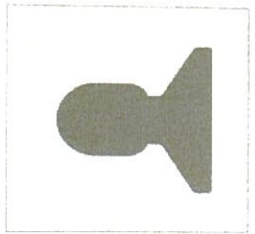
Executed under penalty of perjury on this 14th day of March, 2022.

Major J. Martin 15158
Major Jason Martin

Exhibit 1

Menu

Current language
English



Inmate Login
Clayton County, GA

Inmate ID:

Inmate ID

<

5

2

3

9

4

.

8

7

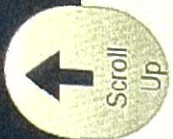
1

0

6

Accept

Close



Inmate Menu








Clayton County, GA







Inmate:

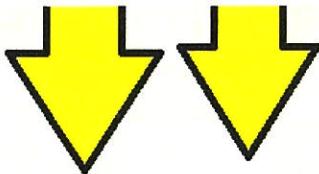
Current Balance:

Medical Balance:
\$0.00

 Buy Phone Time

-  Commissary
-  Mailroom
-  Request System
-  Law Library
-  Inmate Handbook
-  Change Login PIN
-  Log Out

-  Transaction History
-  Grievance System
-  Medical Request
-  Video Visitation
-  Jail Documents
-  Inmate Documents

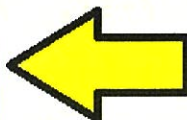


Tap on an entry to [view more details](#).

No current requests

Tap on an entry to view more details.

Closed Requests



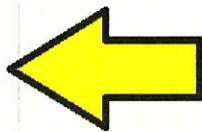
VW D1 - R

2:43 PM

New Request

 Cancel Request

 Submit Request



Date Added 03/03/2022 - 2:45 pm

Subject

Request

Category:

☐ Accounting

☐ Barber Services

☐ Bat - Tipster

☐ Beard Trim

☐ Chaplains

☐ Classifications/Courts

☐ Commissary/Food

☐ Grievance

☐ Hair Cut

☐ Hearing Officer

☐ Housing

☐ Inmate Worker

☐ Kitchen

☐ Laundry

☐ Property

☐ Visitation

☐ Work Release

☐ This request is medical in nature



Exhibit 2

Report - Inmates Request History Detail

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	11/12/2019 10:05:06 am EDT	Request ID	960856
Location	6109M	Kiosk	H6 - 1L
Assigned To	wd robinson	Kiosk ID	7632
Status	New	Status Entered	(not answered)
Status By	(not answered)		

Request

HELLO I NEED TO SPEAK WITH YOU ABOUT A POWER OF ATTERNY FORM BECAUSE I MUST SUBMIT A FORM OF CLAIM FROM THE US DEPARTMENT OF JUSTISE . AND IT ALSO NEEDS TO BE SIGNED BY A SWORN OFFICER . A SERTIFIDE MAILING MUST BE DONE AS WELL AS A NOTEARY WTH COPIES . THIS PERTAINING TO THE PROPERTIES THAT WERE SEIZED FROM MEBY THE ATF. I ONLY HAVE A FEW WEEKS TO SEND IT OFF . BECAUSE I JUST GOT IT TODAY AS IM WRITTING YOU ON THIS DAY OF 12 NOV. 2019 . PLEASE CONTACT ME A.S.A.P ! THANK YOU SARGENT ROBINSON...

Admin Notes**Notes to Inmate**

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	10/27/2019 3:58:00 pm EDT	Request ID	934288
Location	6109M	Kiosk	H6 - 1L
Assigned To	R James	Kiosk ID	7632
Status	Resolved Substantiated	Status Entered	10/28/2019 09:15:23 pm EDT
Status By	R James		

Request I would like a haircut and shave

Admin Notes

Notes to Inmate Your name will be added.

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	10/27/2019 4:13:41 pm EDT	Request ID	934311
Location	6109M	Kiosk	H6 - 1L
Assigned To	(all)	Kiosk ID	7632
Status	Resolved Substantiated	Status Entered	10/28/2019 09:16:28 am EDT
Status By	Baker		

Request TRYING TO FIND OUT ABOUT DEPRESSION MEDS AND PANIC ATTACKS MEDS

Admin Notes

Notes to Inmate You will be scheduled for the counselor.

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	10/28/2019 5:25:39 pm EDT	Request ID	936302
Location	6109M	Kiosk	H6 - 1R
Assigned To	(all)	Kiosk ID	7630
Status	Resolved Substantiated	Status Entered	10/28/2019 08:39:47 pm EDT
Status By	F Frazier		

Request I would like to speak with Ms. WEST about my meds and im having panic attacks and xziaty ... I have not had my meds in since THURSDAY last week from unit 1 orentation and mental health.... I also have depression.

Admin Notes

Notes to Inmate You're already scheduled to see mental health.

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	10/30/2019 9:07:56 am EDT	Request ID	938945
Location	6109M	Kiosk	H6 - 1R
Assigned To	(all)	Kiosk ID	7630
Status	Resolved Substantiated	Status Entered	10/30/2019 03:31:50 pm EDT
Status By	T Mitchell		

Request TRYING TO SEE ABOUT HEADACHE MEDS. REAL BAD

Admin Notes

Notes to Inmatescheduled with nurse sick call.

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	11/02/2019 5:10:41 pm EDT	Request ID	944902
Location	6109M	Kiosk	H6 - 1L
Assigned To	(all)	Kiosk ID	7632
Status	Resolved Substantiated	Status Entered	11/04/2019 06:07:16 am EDT
Status By	T Mitchell		

Request HEADACHE MEDS AND I NEED IB PROPHREN. AND ALSO COULD YOU INCREASE MY CYBALTA TO TWICE A DAY BECAUSE IM HAVING BAD PANIC ATTACKS . I HAVE A LOT GOING ON SO COULD I PLEASE SEE A DOCTOR

Admin Notes

Notes to Inmatescheduled for nurse sick call and mental health

10/11/21, 10:08 AM

Clayton - Print Request Detailed

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	11/04/2019 5:25:05 pm EDT	Request ID	948258
Location	6109M	Kiosk	H6 - 1L
Assigned To	(all)	Kiosk ID	7632
Status	Resolved Substantiated	Status Entered	11/05/2019 10:48:50 am EDT
Status By	Baker		

Request I NEED TO SPEAK TO MS. WEST BECAUSE I REALLY NEED TO SPEAK HERE ABOUT PANIC ATTACKS ANIEZYATY BAD !!!!!

Admin Notes

Notes to Inmate

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	11/05/2019 6:48:38 pm EDT	Request ID	950400
Location	6109M	Kiosk	H6 - 1R
Assigned To	(all)	Kiosk ID	7630
Status	Resolved Substantiated	Status Entered	11/06/2019 08:59:58 am EDT
Status By	Baker		

Request TRYING TO GET MY CYMBALTA CHANGED TO TWO A DAY FOR DEPRESSION FOR REAL BAD PANIC ATTACKS.PLEASE ONE IN THE DAY AND ONE AT NIGHT.

Admin Notes

Notes to Inmate You have a scheduled follow up with the provider, they will discuss medication changes with you at that time.

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	11/07/2019 7:17:01 pm EDT	Request ID	954537
Location	6109M	Kiosk	H6 - 1R
Assigned To	(all)	Kiosk ID	7630
Status	Resolved Substantiated	Status Entered	11/11/2019 05:52:31 am EDT
Status By	T Mitchell		

Request I NEED TO SEE A DCT ABOUT MY RIGHT KNEE AND RIGHT FOOT PAIN . ALSO MY ARTERITUS PAIN

Admin Notes

Notes to Inmate You have been scheduled with nurse sick call.

Inmate Name	TIMOTHY ONEAL	Inmate ID	2100478
Created	11/08/2019 4:40:38 pm EDT	Request ID	956111
Location	6109M	Kiosk	H6 - 1R
Assigned To	A Smith	Kiosk ID	7630
Status	Resolved Unsubstantiated	Status Entered	11/11/2019 02:23:07 pm EDT
Status By	M calloway		

Request I WOULD LIKE TO BECOME AN INMATE WORKER

Admin Notes

Notes to Inmate ma'am you are a maximum security inmate so you don't qualify